

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

XRAMP TECHNOLOGIES, INC. and
XRAMP SECURITY SERVICES, INC.,

Plaintiff,

v.

GEOTRUST, INC. and
CHRISTOPHER BAILEY,

Defendants.

Civil Action No. 05-11374-RCL

GEOTRUST, INC.,

Counterclaim-Plaintiff,

v.

XRAMP TECHNOLOGIES, INC. and
XRAMP SECURITY SERVICES, INC.,

Counterclaim Defendants.

STATEMENT OF COMPLIANCE WITH LOCAL RULE 37.1

Pursuant to Local Rule 37.1 and this Court's Order dated September 12, 2005, counsel for GeoTrust, Inc. ("GeoTrust") states that in an effort to resolve or to narrow the matters that are set forth in the accompanying Motion to Compel the Production of Documents and Interrogatory Answers, counsel for the parties have communicated on numerous occasions by telephone, including, most recently on March 9 and 10, 2006. In addition, counsel for GeoTrust has sent letters to counsel for XRamp on January 18, 2006; January 31, 2006; February 8, 2006; February 15, 2006; February 16, 2006; February 28, 2006; March 9, 2006; and March 13, 2006. Those letters are attached to the Tighe Affidavit as Ex. G.

Those letters and telephone conversations were unable to resolve or narrow the matters involved in this dispute. XRamp: (a) still not produced those documents that it has promised to produce; (b) will not produce what it considers “confidential” in the absence of a court order; (c) will not agree to produce a privilege log of documents that it will withhold from production; and (d) XRamp will not produce whatever industry and other data that it used to calculate its damages in this case.

GEOTRUST, INC. and
CHRISTOPHER BAILEY,

By their attorneys,

/s/ Daniel P. Tighe
Daniel P. Tighe (BBO # 556583)
Scott McConchie (BBO # 634127)
Griesinger, Tighe & Maffei, LLP
176 Federal Street
Boston, MA 02110
(617) 542-9900

Dated: March 17, 2006

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on March 17, 2006.

/s/ Daniel P. Tighe
Daniel P. Tighe